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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**RON TSUR,**

Plaintiff,

v.

**INTEL CORPORATION,**

Defendant.

Case No. 3:21-cv-00655-SI

**STIPULATED RULE 16 MOTION TO  
EXTEND TIME TO AMEND  
PLEADINGS AND JOIN ADDITIONAL  
PARTIES**

Pursuant to Fed. R. Civ. P. Rule 16 and LR 16-3(a), the parties move the Court for an order extending discovery and pretrial deadlines in this case. This motion is based on the following showing of good cause:

This matter has progressed steadily since it was filed on April 29, 2021 in United States District Court for the District of Oregon, Portland Division. On October 8, 2021, the Court partly granted Defendant's Partial Motion to Dismiss and denied Defendant's Motion to Strike, and allowed Plaintiff leave to amend his Complaint. On October 22, 2021, Plaintiff filed an Amended

Complaint. The Parties stipulated that Defendant could file its Answer and Defenses on November 12, 2021, and Defendant timely did so.

The parties have exchanged Initial Disclosures and are in the process of conferral as to the proper scope of discovery. Pursuant to LR 16-3(a), and based on their conferral, the parties propose the deadline to Amend Pleadings and Join Additional Parties be advanced from March 31, 2022 to April 14, 2022.

SO STIPULATED this 30th day of March, 2021.

/s/ Shanti Lewallen

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***Of Attorneys for Defendant Intel Corporation***

**CERTIFICATE OF SERVICE**

I certify that I served the foregoing *Stipulated Rule 16 Motion to Extend Deadline to Amend Pleadings and Join Additional Parties* on this 30th day of March 2022, by:

- ☐ Facsimile
- ☐ First Class Mail
- ☐ Hand-Delivery
- ☒ E-mail
- ☒ CM/ECF Service

directing a true copy thereof to Defendants' attorneys at the address(es) shown below:

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DATED this 30th day of March 2022.

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***Attorney for Plaintiff***

IN THE UNITED STATES DISTRICT COURT  
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**RON TSUR,**

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Case No. 3:21-cv-00655-SI

**PROPOSED ORDER EXTENDING THE  
DEADLINE TO AMEND AND JOIN  
ADDITIONAL PARTIES**

**PROPOSED ORDER**

And now, on this \_\_ day of \_\_\_\_\_ 2022, upon consideration of the Parties' Stipulated Rule 16 Motion to Extend the Deadline to Amend and Add Parties, it is hereby ORDERED that the Parties' Motion is GRANTED. The deadline to amend and join additional parties is now the 14th of April 2022.

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THE HONORABLE MICHAEL H. SIMON